

LAW OFFICE OF TODD D. LERAS  
Todd D. Leras, CA SBN 145666  
455 Capitol Mall, Suite 802  
Sacramento, California 95814  
(916) 504-3933  
[toddleras@gmail.com](mailto:toddleras@gmail.com)  
Attorney for Defendant  
DAVID HANSEN

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
DAVID KENNETH HANSEN,  
  
Defendant.

Case No.: 2:20-cr-021 TLN

STIPULATION AND ORDER  
CONTINUING STATUS CONFERENCE  
AND EXCLUDING TIME UNDER THE  
SPEEDY TRIAL ACT

Date: September 15, 2022  
Time: 9:30 a.m.  
Court: Hon. Troy L. Nunley

Plaintiff United States of America by and through Assistant United States Attorney James  
Conolly, and Attorney Todd Leras on behalf of Defendant David Hansen, stipulate as follows:

1. This matter is presently set for a status conference on September 15, 2022. By this  
stipulation, Defendant Hansen moves to continue the status conference to November  
10, 2022.

ORDER CONTINUING STATUS  
CONFERENCE

2. This case involves drug trafficking and firearm charges stemming from execution of search warrants in Sacramento and Placer Counties.
3. The government produced supplemental discovery materials in July 2022, including hundreds of hours of video recordings, downloaded onto an external hard drive provided by defense counsel. These video recordings are so voluminous that they required computer storage space estimated to be more than two terabytes. Defense counsel is continuing to review these materials with Mr. Hansen. The government also provided the terms of a proposed resolution offer to Mr. Hansen.
4. The defense is proceeding with its own investigation based on the supplemental discovery provided by the government. In addition, defense counsel is discussing the proposed settlement agreement with Mr. Hansen. The defense therefore requests additional time to perform its investigation. The additional time is needed to follow up on information contained within the supplemental discovery materials mentioned in the preceding paragraph.
5. Given the ongoing defense investigation, Defendant Hansen requests to continue the status conference in this matter to November 10, 2022, at 9:30 a.m., and to exclude time between September 15, 2022, and November 10, 2022, inclusive, under Local Code T-4. The United States does not oppose this request.
6. Attorney Todd Leras represents and believes that failure to grant additional time as requested would deny Defendant Hansen the reasonable time necessary for effective preparation, considering the exercise of due diligence.
7. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, *et*

ORDER CONTINUING STATUS  
CONFERENCE

1 *seq.*, within which trial must commence, the time period of September 15, 2022 to  
2 November 10, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. §  
3 3161(h)(7)(A), and (B) (iv) [Local Code T-4] because it results from a continuance  
4 granted by the Court at Defendant Hansen's request on the basis that the ends of  
5 justice served by taking such action outweigh the best interest of the public and the  
6 Defendant in a speedy trial.  
7

- 8 8. Nothing in this stipulation and order shall preclude a finding that other provisions of  
9 the Speedy Trial Act dictate that additional time periods are excludable from the  
10 period within which a trial must commence.  
11

12 Assistant U.S. Attorney James Conolly has reviewed this proposed order and authorized  
13 Todd Leras via email to sign it on his behalf.

14 DATED: September 12, 2022

PHILLIP A. TALBERT  
United States Attorney

15  
16 By /s/ Todd D. Leras for  
JAMES CONOLLY  
Assistant United States Attorney  
17

18 DATED: September 12, 2022

19 By /s/ Todd D. Leras  
TODD D. LERAS  
Attorney for Defendant  
DAVID HANSEN  
20  
21  
22  
23  
24  
25  
26  
27

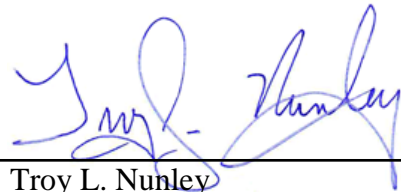
28 ORDER CONTINUING STATUS  
CONFERENCE

**ORDER**

BASED ON THE REPRESENTATIONS AND STIPULATION OF THE PARTIES, it is hereby ordered that the status conference in this matter, scheduled for September 15, 2022, is vacated. A new status conference is scheduled for November 10, 2022, at 9:30 a.m. The Court further finds, based on the representations of the parties and Defendant Hansen's request, that the ends of justice served by granting the continuance outweigh the best interests of the public and the Defendant in a speedy trial. Time shall be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B)(iv) and Local Code T-4, to allow necessary attorney preparation taking into consideration the exercise of due diligence for the period from September 15, 2022, up to and including November 10, 2022.

IT IS SO ORDERED.

DATED: September 13, 2022

---

Troy L. Nunley  
United States District Judge

ORDER CONTINUING STATUS  
CONFERENCE